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9	HARITED CTATECT	DISTRICT COLLET
10	UNITED STATES I DISTRICT O	
	District o	
11	TRUSTEES OF THE NEVADA RESORT	Case No. 2:23-cv-00149-RFB-DJA
12	ASSOCIATION—INTERNATIONAL	
	ALLIANCE OF THEATRICAL STAGE	CTIDIII ATIONI AND DECLIEST TO
13	EMPLOYEES AND MOVING PICTURE MACHINE OPERATORS OF THE UNITED	STIPULATION AND REQUEST TO EXTEND TIME TO FILE
14	STATES AND CANADA, LOCAL 720,	RESPONSE TO MOTION TO
	PENSION TRUST; TRUSTEES OF THE	DISMISS AND TO EXTEND TIME
15	NEVADA RESORT ASSOCIATION—	TO REPLY TO THE SAME
16	INTERNATIONAL ALLIANCE OF) /F:
	THEATRICAL STAGE EMPLOYEES AND MOVING PICTURE MACHINE	(First Request)
17	OPERATORS OF THE UNITED STATES	
18	AND CANADA, LOCAL 720, WAGE	
	DISABILITY TRUST; and TRUSTEES OF	
19	THE NEVADA RESORT ASSOCIATION— INTERNATIONAL ALLIANCE OF	
20	THEATRICAL STAGE EMPLOYEES AND	
21	MOVING PICTURE MACHINE OPERATORS OF THE UNITED STATES	
22	AND CANADA, LOCAL 720, APPRENTICE	
23	AND JOURNEYMAN TRAINING AND EDUCATION TRUST,	
)
24	Plaintiffs,	
25	vs.))
26	BIG FIN 720, LLC, a Domestic Limited-Liability	
27	Company; BIG FIN VEGAS, LLC, a Domestic	
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1	Limited-Liability Company; BIG FIN
2	PRODUCTIONS, LLC, a Domestic Limited- Liability Company; and BIG FIN
3	INTERNATIONAL, LLC, a Domestic Limited-) Liability Company,
4	
5	Defendants.)
6	BIG FIN 720, LLC, a Domestic Limited-Liability)
7	Company; BIG FIN VEGAS, LLC, a Domestic) Limited-Liability Company; BIG FIN)
8	PRODUCTIONS, LLC, a Domestic Limited-
9	Liability Company; and BIG FIN INTERNATIONAL, LLC, a Domestic Limited-)
10	Liability Company,)
11	Counterclaim-Plaintiffs,
12	vs.
13	TRUSTEES OF THE NEVADA RESORT) ASSOCIATION—INTERNATIONAL)
14	ALLIANCE OF THEATRICAL STAGE)
15	EMPLOYEES AND MOVING PICTURE) MACHINE OPERATORS OF THE UNITED)
16	STATES AND CANADA, LOCAL 720,
	PENSION TRUST; TRUSTEES OF THE NEVADA RESORT ASSOCIATION—
17	INTERNATIONAL ALLIANCE OF
18	THEATRICAL STAGE EMPLOYEES AND) MOVING PICTURE MACHINE)
19	OPERATORS OF THE UNITED STATES)
20	AND CANADA, LOCAL 720, WAGE DISABILITY TRUST; and TRUSTEES OF
21	THE NEVADA RESORT ASSOCIATION—
22	INTERNATIONAL ALLIANCE OF) THEATRICAL STAGE EMPLOYEES AND)
	MOVING PICTURE MACHINE OPERATORS OF THE UNITED STATES)
23	AND CANADA, LOCAL 720, APPRENTICE
24	AND JOURNEYMAN TRAINING AND
25	EDUCATION TRUST,
26	Counterclaim-Defendants.)
27	

 $Kamer\ Zucker\ Abbott \quad {\it Attorneys}\ at\ {\it Law}$

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1	BIG FIN 720, LLC, a Domestic Limited-Liability)
2	Company; BIG FIN VEGAS, LLC, a Domestic Limited-Liability Company; BIG FIN
3	PRODUCTIONS, LLC, a Domestic Limited- Liability Company; and BIG FIN
4	INTERNATIONAL, LLC, a Domestic Limited- Liability Company,
5	
6	Third-Party Plaintiffs,
7	vs.
8	INTERNATIONAL ALLIANCE OF THEATRICAL STAGE EMPLOYEES AND
9	MOVING PICTURE MACHINE
10	OPERATORS OF THE UNITED STATES AND CANADA, LOCAL 720, a Labor
11	Organization; MARIELLE "APPLE" THORNE, an Individual; PHIL JAYNES, an Individual; and
12	RONALD POVEROMO, an Individual,
13	Third-Party Defendants.

Pursuant to LR 6-1, Third-Party Plaintiffs, BIG FIN 720, LLC; BIG FIN VEGAS, LLC; BIG FIN PRODUCTIONS, LLC; AND BIG FIN INTERNATIONAL, LLC ("Third-Party Plaintiffs") and Third-Party Defendants INTERNATIONAL ALLIANCE OF THEATRICAL STAGE EMPLOYEES AND MOVING PICTURE MACHINE OPERATORS OF THE UNITED STATES AND CANADA, LOCAL 720 ("Union"), MARIELLE "APPLE" THORNE, and PHIL JAYNES (collectively "Third-Party Defendants") by and through their respective counsel of record, stipulate and request that the Court extend the deadline for Third-Party Plaintiffs to respond to the Third-Party Defendants' Motion to Dismiss ("Motion") from the current deadline of June 9, 2023 up to and including June 22, 2023, as well as extend the Third Party Defendants' deadline to file its Reply from June 30, 2023 up to and including July 13, 2023.

In support of this Stipulation and Request, the parties state the following:

1. Third-Party Defendants filed their Motion on May 26, 2023. Accordingly, Third-Party Plaintiffs' response to the Motion is currently due by June 9, 2023.

2. On June 6, 2023, and June 7, 2023, Third-Party Plaintiffs requested an extension of time to respond to the Motion and proposed an equal extension of time for Third-Party Defendants to file their Reply. The parties agreed to an extension on June 8, 2023. Accordingly, if approved by the Court, the new deadline for Third-Party Plaintiffs to respond to the Motion would be June 22, 2023 and Third-Party Defendants Reply would then be due twenty-one (21) days later on July 13, 2023.

- 3. This request is brought in good faith and not sought for the purpose of delay or any other improper purpose. Rather, this request is sought to provide Third-Party Plaintiffs' counsel sufficient time to review and respond to the issues raised in the Motion in light of the Memorial Day holiday, presently demanding workload, other looming deadlines, and personal commitments. It also allows Third-Party Defendants' counsel to navigate pre-existing travel plans in June, including of the client, and the July 4 holiday.
- 4. This is the first request to extend the deadline to respond to the Motion and to reply to Third-Party Plaintiff's response. No previous extensions of time have been granted.

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WHEREFORE, the parties respectfully request that the Court extend the deadline for 1 Third-Party Plaintiffs to respond to the Motion from the current deadline of June 9, 2023, up to and 2 including June 22, 2023, and correspondingly extend the Third-Party Defendants' deadline to reply 3 through July 13, 2023. 4 5 6 WEINBERG, ROGER & ROSENFELD KAMER ZUCKER ABBOTT 7 8 By: /s/ Joseph T. Adamiak By: /s/ Dare Heisterman Sean W. McDonald, Esq. R. Todd Creer #10016 9 3199 E. Warm Springs Road, Suite 400 Nicole A. Martin #13423 Las Vegas, Nevada 89120 Dare E. Heisterman #14060 10 3000 West Charleston Boulevard Las Vegas, Nevada 89102 Joseph T. Adamiak, Esq. 11 800 Wilshire Boulevard, Suite 1020 Tel: (702) 259-8640 Los Angeles, California 90017 Fax: (702) 259-8646 12 13 Attorneys for Third-Party Defendants Attorneys for Third-Party Plaintiffs IATSE Local 720, Marielle "Apple" 14 Thorne and Phil Jaynes 15 **ORDER** 16 IT IS SO ORDERED. 17 DATE: June 9, 2023 18 UNITED STATES DISTRICT JUDGE 19 20 21 22 23 24 25 26 27

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